

**U.S. Department of Commerce
U.S. Patent and Trademark Office**



**Privacy Impact Assessment
for the
Executive Document Management System Cloud (EDMS-C)**

Reviewed by: Henry J. Holcombe, Bureau Chief Privacy Officer

- Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer
 Non-concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer

Jennifer Goode

09/21/2021

Signature of Senior Agency Official for Privacy/DOC Chief Privacy Officer

Date

U.S. Department of Commerce Privacy Impact Assessment USPTO Executive Document Management System Cloud (EDMS-C)

Unique Project Identifier: PTOC-042-00

Introduction: System Description

Provide a description of the system that addresses the following elements:

The response must be written in plain language and be as comprehensive as necessary to describe the system.

The EDMS-C is an Application information system, used by the Under Secretary of Commerce for Intellectual Property and Director of the United States Patent and Trademark Office to receive and respond to a wide range of official correspondence, by electronically capturing, routing, and tracking both incoming and response documents, thereby improving workflow. EDMS-C also serves as an electronic repository of documents such as Action Decision Memoranda, Congressional Inquiries, Federal Registry Notices, Delegations of Authority, Public Advisory Committee (PAC) Nomination Process, and General Letters to the Agency. EDMS-C also records the status of all actions taken on official correspondence and creates immediate activity reporting and provides users a graphical user interface via a Web browser.

(a) Whether it is a general support system, major application, or other type of system

EDMS-C is a general support system.

(b) System location

Cloud based services platform hosted by Leidos Digital Solutions, Inc

(c) Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)

EDMS-C interconnects with:

Network and Security Infrastructure System (NSI)

The NSI is an Infrastructure information system, and provides an aggregate of subsystems that facilitates the communications, secure access, protective services, and network infrastructure support for all United States Patent and Trademark Office (USPTO) IT applications.

Service Oriented Infrastructure (SOI)

The SOI provides a feature-rich and stable platform upon which USPTO applications can be deployed.

ESS-RBAC-Role Based Access Control (RBAC)

The ESS provides Enterprise Directory Services, Role-Based Access Control System, Email as a Service, PTO Exchange Services, Symantec Endpoint Protection, Enterprise SharePoint Services, etc.

Enterprise UNIX Services (EUS)

EUS consists of assorted UNIX operating system variants (OS), each comprised of many utilities along with the master control program, the kernel.

Enterprise Monitoring and Security Operations (EMSO)

EMSO provides a centralized command and control console with integrated enterprise log management, security information and event management, network behavior analysis, and reporting through the collection of events, network/application flow data, vulnerability data, and identity information.

Enterprise Windows Services (EWS)

EWS is an Infrastructure information system, and provides a hosting platform for major applications that support various USPTO missions.

(d) The way the system operates to achieve the purpose(s) identified in Section 4

The system operates by generating actions, tracking the status of actions, recording data, and improving the use of automated tools to schedule, manage and monitor follow up of information and documents among staff.

(e) How information in the system is retrieved by the user

USPTO users have access to the EDMS-C system through a web interface that utilizes Single Sign on (SSO). The access level defines if they have access to the PII information. When an attachment is either created or requested, EDMS-C waits for the file to be modified on the user's workstation. If it is changed, the system asks the user if the updated version should be sent back to the server. The file is easily uploaded without further user intervention.

(f) How information is transmitted to and from the system

Information is gathered from the public users and access by internal users using an interface secured by HTTP forwarded to HTTPS to which requests receive responses in the form of HTML pages that are sent back to the user for display in a Web browser.

(g) Any information sharing conducted by the system

No.

(h) The specific programmatic authorities (statutes or Executive Orders) for collecting, maintaining, using, and disseminating the information

44 USC 3101, the America Invents Act, and 35 USC 5

(i) The Federal Information Processing Standards (FIPS) 199 security impact category for the system

EDMS-C has a FIPS199 categorization of Moderate.

Section 1: Status of the Information System

1.1 Indicate whether the information system is a new or existing system.

- This is a new information system.
- This is an existing information system with changes that create new privacy risks. *(Check all that apply.)*

Changes That Create New Privacy Risks (CTCNPR)					
a. Conversions	<input type="checkbox"/>	d. Significant Merging	<input type="checkbox"/>	g. New Interagency Uses	<input type="checkbox"/>
b. Anonymous to Non-Anonymous	<input type="checkbox"/>	e. New Public Access	<input type="checkbox"/>	h. Internal Flow or Collection	<input type="checkbox"/>
c. Significant System Management Changes	<input type="checkbox"/>	f. Commercial Sources	<input type="checkbox"/>	i. Alteration in Character of Data	<input type="checkbox"/>
j. Other changes that create new privacy risks (specify):					

- This is an existing information system in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment.
- This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2015 or 01-2017).
- This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2019 or later).

Section 2: Information in the System

2.1 Indicate what personally identifiable information (PII)/business identifiable information (BII) is collected, maintained, or disseminated. *(Check all that apply.)*

Identifying Numbers (IN)					
a. Social Security*	<input type="checkbox"/>	f. Driver's License	<input type="checkbox"/>	j. Financial Account	<input type="checkbox"/>
b. Taxpayer ID	<input type="checkbox"/>	g. Passport	<input type="checkbox"/>	k. Financial Transaction	<input type="checkbox"/>
c. Employer ID	<input type="checkbox"/>	h. Alien Registration	<input type="checkbox"/>	l. Vehicle Identifier	<input type="checkbox"/>
d. Employee ID	<input type="checkbox"/>	i. Credit Card	<input type="checkbox"/>	m. Medical Record	<input type="checkbox"/>
e. File/Case ID	<input type="checkbox"/>				
n. Other identifying numbers (specify):					

EDMS-C does not collect any Identifying Numbers.					
*Explanation for the business need to collect, maintain, or disseminate the Social Security number, including truncated form:					
General Personal Data (GPD)					
a. Name	<input checked="" type="checkbox"/>	h. Date of Birth	<input type="checkbox"/>	o. Financial Information	<input type="checkbox"/>
b. Maiden Name	<input type="checkbox"/>	i. Place of Birth	<input type="checkbox"/>	p. Medical Information	<input type="checkbox"/>
c. Alias	<input type="checkbox"/>	j. Home Address	<input checked="" type="checkbox"/>	q. Military Service	<input type="checkbox"/>
d. Gender	<input type="checkbox"/>	k. Telephone Number	<input checked="" type="checkbox"/>	r. Criminal Record	<input type="checkbox"/>
e. Age	<input type="checkbox"/>	l. Email Address	<input checked="" type="checkbox"/>	s. Physical Characteristics	<input type="checkbox"/>
f. Race/Ethnicity	<input type="checkbox"/>	m. Education	<input checked="" type="checkbox"/>	t. Mother's Maiden Name	<input type="checkbox"/>
g. Citizenship	<input type="checkbox"/>	n. Religion	<input type="checkbox"/>		
u. Other general personal data (specify):					

Work-Related Data (WRD)					
a. Occupation	<input checked="" type="checkbox"/>	e. Work Email Address	<input checked="" type="checkbox"/>	i. Business Associates	<input checked="" type="checkbox"/>
b. Job Title	<input checked="" type="checkbox"/>	f. Salary	<input type="checkbox"/>	j. Proprietary or Business Information	<input type="checkbox"/>
c. Work Address	<input checked="" type="checkbox"/>	g. Work History	<input checked="" type="checkbox"/>	k. Procurement/contracting records	<input type="checkbox"/>
d. Work Telephone Number	<input checked="" type="checkbox"/>	h. Employment Performance Ratings or other Performance Information	<input type="checkbox"/>		
l. Other work-related data (specify):					

Distinguishing Features/Biometrics (DFB)					
a. Fingerprints	<input type="checkbox"/>	f. Scars, Marks, Tattoos	<input type="checkbox"/>	k. Signatures	<input type="checkbox"/>
b. Palm Prints	<input type="checkbox"/>	g. Hair Color	<input type="checkbox"/>	l. Vascular Scans	<input type="checkbox"/>
c. Voice/Audio Recording	<input type="checkbox"/>	h. Eye Color	<input type="checkbox"/>	m. DNA Sample or Profile	<input type="checkbox"/>
d. Video Recording	<input type="checkbox"/>	i. Height	<input type="checkbox"/>	n. Retina/Iris Scans	<input type="checkbox"/>
e. Photographs	<input type="checkbox"/>	j. Weight	<input type="checkbox"/>	o. Dental Profile	<input type="checkbox"/>
p. Other distinguishing features/biometrics (specify):					

System Administration/Audit Data (SAAD)					
a. UserID	<input type="checkbox"/>	c. Date/Time of Access	<input checked="" type="checkbox"/>	e. ID Files Accessed	<input checked="" type="checkbox"/>
b. IP Address	<input checked="" type="checkbox"/>	f. Queries Run	<input type="checkbox"/>	f. Contents of Files	<input type="checkbox"/>
g. Other system administration/audit data (specify):					

Other Information (specify)					

2.2 Indicate sources of the PII/BII in the system. (Check all that apply.)

Directly from Individual about Whom the Information Pertains					
In Person	<input type="checkbox"/>	Hard Copy: Mail/Fax	<input type="checkbox"/>	Online	<input checked="" type="checkbox"/>
Telephone	<input type="checkbox"/>	Email	<input type="checkbox"/>		
Other(specify):					

Government Sources					
Within the Bureau	<input type="checkbox"/>	Other DOC Bureaus	<input type="checkbox"/>	Other Federal Agencies	<input type="checkbox"/>
State, Local, Tribal	<input type="checkbox"/>	Foreign	<input type="checkbox"/>		
Other(specify): None					

Non-government Sources					
Public Organizations	<input type="checkbox"/>	Private Sector	<input type="checkbox"/>	Commercial Data Brokers	<input type="checkbox"/>
Third Party Website or Application			<input type="checkbox"/>		
Other(specify): Members of the Public					

2.3 Describe how the accuracy of the information in the system is ensured.

<p>The PII is directly imported into EDMS-C from the originating system. USPTO implements security and management controls to prevent the inappropriate disclosure of sensitive information. Security controls are employed to ensure information is resistant to tampering, remains confidential as necessary, and is available as intended by the agency and as expected by authorized users. Management controls are utilized to prevent the inappropriate disclosure of sensitive information. In addition, the Perimeter Network (NSI) provides additional automated transmission and monitoring mechanisms to ensure that PII information is protected and not breached by external entities. Information is collected from the users directly and collected data is used for decision making only.</p>

2.4 Is the information covered by the Paperwork Reduction Act?

<input type="checkbox"/>	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection.
<input checked="" type="checkbox"/>	No, the information is not covered by the Paperwork Reduction Act.

2.5 Indicate the technologies used that contain PII/BII in ways that have not been previously deployed. (Check all that apply.)

Technologies Used Containing PII/BII Not Previously Deployed (TUCPBNPD)			
Smart Cards	<input type="checkbox"/>	Biometrics	<input type="checkbox"/>

Caller-ID	<input type="checkbox"/>	Personal Identity Verification (PIV) Cards	<input type="checkbox"/>
Other (specify):			

<input checked="" type="checkbox"/>	There are not any technologies used that contain PII/BII in ways that have not been previously deployed.
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Section 3: System Supported Activities

3.1 Indicate IT system supported activities which raise privacy risks/concerns. *(Check all that apply.)*

Activities			
Audio recordings	<input type="checkbox"/>	Building entry readers	<input type="checkbox"/>
Video surveillance	<input type="checkbox"/>	Electronic purchase transactions	<input type="checkbox"/>
Other (specify):			

<input checked="" type="checkbox"/>	There are not any IT systems supported activities which raise privacy risks/concerns.
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Section 4: Purpose of the System

4.1 Indicate why the PII/BII in the IT system is being collected, maintained, or disseminated. *(Check all that apply.)*

Purpose			
For a Computer Matching Program	<input type="checkbox"/>	For administering human resources programs	<input type="checkbox"/>
For administrative matters	<input checked="" type="checkbox"/>	To promote information sharing initiatives	<input checked="" type="checkbox"/>
For litigation	<input type="checkbox"/>	For criminal law enforcement activities	<input type="checkbox"/>
For civil enforcement activities	<input type="checkbox"/>	For intelligence activities	<input type="checkbox"/>
To improve Federal services online	<input type="checkbox"/>	For employee or customer satisfaction	<input type="checkbox"/>
For web measurement and customization technologies (single-session)	<input type="checkbox"/>	For web measurement and customization technologies (multi-session)	<input type="checkbox"/>
Other (specify):			

Section 5: Use of the Information

5.1 In the context of functional areas (business processes, missions, operations, etc.) supported by the IT system, describe how the PII/BII that is collected, maintained, or disseminated will be used. Indicate if the PII/BII identified in Section 2.1 of this document is in reference to a federal employee/contractor, member of the public, foreign national, visitor or other (specify).

The PII collected is to identify potential nominees (from the general public) for the Public Advisory Committees as part of the American Inventors Protection Act of 1999.

5.2 Describe any potential threats to privacy, such as insider threat, as a result of the bureau's/operating unit's use of the information, and controls that the bureau/operating unit has put into place to ensure that the information is handled, retained, and disposed appropriately. (For example: mandatory training for system users regarding appropriate handling of information, automatic purging of information in accordance with the retention schedule, etc.)

To access EDMS-C for submission and reviewing of data, the business unit management responsible for the user must submit a request for access that must be approved by the Lead Executive Correspondence Specialist (ECS) within the Office of the Under Secretary and Director. USPTO has also identified and evaluated potential threats to PII such as insider threats and adversarial entities which may cause a loss of confidentiality, accessibility and integrity of information. Users are provided one-on-one, weekly, and monthly training. All users have access restriction or permissions based on the built-in security controls of the system. Furthermore, the system has the ability to password protect any sensitive data for added protection. Data retention is managed automatically using IQ Archivist in accordance with records management retention policy. System access to PII data is limited to a restricted set of users.

Section 6: Information Sharing and Access

6.1 Indicate with whom the bureau intends to share the PII/BII in the IT system and how the PII/BII will be shared. *(Check all that apply.)*

Recipient	How Information will be Shared		
	Case-by-Case	Bulk Transfer	Direct Access
Within the bureau	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DOC bureaus	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Federal agencies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
State, local, tribal gov't agencies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Private sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Foreign governments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Foreign entities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The PII/BII in the system will not be shared.

6.2 Does the DOC bureau/operating unit place a limitation on re-dissemination of PII/BII shared with external agencies/entities?

Yes, the external agency/entity is required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.

<input type="checkbox"/>	No, the external agency/entity is not required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
<input checked="" type="checkbox"/>	No, the bureau/operating unit does not share PII/BII with external agencies/entities.

6.3 Indicate whether the IT system connects with or receives information from any other IT systems authorized to process PII and/or BII.

<input checked="" type="checkbox"/>	<p>Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage:</p> <p>ESS-RBAC-Role Based Access Control (RBAC) Personally Identifiable Information in ESS is secured using appropriate administrative, physical and technical safeguards in accordance with the applicable federal laws, Executive Orders, directives, policies, and standards. All access has role based restrictions, and individuals with access privileges have undergone vetting and suitability screening. Data is maintained in areas accessible only to authorized personnel. The USPTO maintains an audit trail and performs random periodic reviews to identify unauthorized access and changes as part of verifying the integrity of data. Information is protected through a layered security approach which incorporates the use of secure authentication, access control, mandatory configuration settings, firewalls, Virtual Private Network (VPN), and encryption, where required. Internally within USPTO, data transmission confidentiality controls are provided by PTONet.</p>
<input type="checkbox"/>	No, this IT system does not connect with or receive information from another IT system(s) authorized to process PII and/or BII.

6.4 Identify the class of users who will have access to the IT system and the PII/BII. (Check all that apply.)

Class of Users			
General Public	<input type="checkbox"/>	Government Employees	<input checked="" type="checkbox"/>
Contractors	<input checked="" type="checkbox"/>		
Other (specify):			

Section 7: Notice and Consent

7.1 Indicate whether individuals will be notified if their PII/BII is collected, maintained, or disseminated by the system. (Check all that apply.)

<input checked="" type="checkbox"/>	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.	
<input checked="" type="checkbox"/>	Yes, notice is provided by a Privacy Act statement and/or privacy policy. The Privacy Act statement and/or privacy policy can be found at: http://www.uspto.gov/privacy-policy	
<input type="checkbox"/>	Yes, notice is provided by other means.	Specify how:

<input type="checkbox"/>	No, notice is not provided.	Specify why not:
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7.2 Indicate whether and how individuals have an opportunity to decline to provide PII/BII.

<input checked="" type="checkbox"/>	Yes, individuals have an opportunity to decline to provide PII/BII.	Specify how: The PAC nomination forms are voluntary. The information is required in order to be nominated.
<input type="checkbox"/>	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not:

7.3 Indicate whether and how individuals have an opportunity to consent to particular uses of their PII/BII.

<input type="checkbox"/>	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not: Usage of PII/BII collected is solely for PAC nominations. No other usage is authorized with this data set.

7.4 Indicate whether and how individuals have an opportunity to review/update PII/BII pertaining to them.

<input type="checkbox"/>	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not: Individuals do not have an opportunity to review/update their information within this system but individuals can submit their information and have the ability to correct it with updates through the office of the Undersecretary.

Section 8: Administrative and Technological Controls

8.1 Indicate the administrative and technological controls for the system. *(Check all that apply.)*

<input checked="" type="checkbox"/>	All users signed a confidentiality agreement or non-disclosure agreement.
<input checked="" type="checkbox"/>	All users are subject to a Code of Conduct that includes the requirement for confidentiality.
<input checked="" type="checkbox"/>	Staff (employees and contractors) received training on privacy and confidentiality policies and practices.
<input checked="" type="checkbox"/>	Access to the PII/BII is restricted to authorized personnel only.
<input checked="" type="checkbox"/>	Access to the PII/BII is being monitored, tracked, or recorded. Explanation: Audit logs
<input checked="" type="checkbox"/>	The information is secured in accordance with the Federal Information Security Modernization Act (FISMA) requirements. Provide date of most recent Assessment and Authorization (A&A): <u>8/30/21</u> <input type="checkbox"/> This is a new system. The A&A date will be provided when the A&A package is approved.

<input checked="" type="checkbox"/>	The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher.
<input checked="" type="checkbox"/>	NIST Special Publication (SP) 800-122 and NIST SP 800-53 Revision 4 Appendix J recommended security controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POA&M).
<input checked="" type="checkbox"/>	A security assessment report has been reviewed for the information system and it has been determined that there are no additional privacy risks.
<input checked="" type="checkbox"/>	Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy.
<input type="checkbox"/>	Contracts with customers establish DOC ownership rights over data including PII/BII.
<input type="checkbox"/>	Acceptance of liability for exposure of PII/BII is clearly defined in agreements with customers.
<input type="checkbox"/>	Other (specify):

8.2 Provide a general description of the technologies used to protect PII/BII on the IT system. *(Include data encryption in transit and/or at rest, if applicable).*

<p>Management Controls:</p> <ul style="list-style-type: none"> a) The USPTO uses the Life Cycle review process to ensure that management controls are in place for EDMS-C. During the enhancement of any component, the security controls are reviewed, re-evaluated, and updated in the Security Plan. The Security Plans specifically address the management, operational and technical controls that are in place, and planned, during the operation of the enhanced system. Additional management controls include performing national agency checks on all personnel, including contractor staff. b) The USPTO uses the Personally Identifiable Data Extracts Policy. This means no extracts of sensitive data may be copied on to portable media without a waiver approved by the DOC CIO. <p>Operational Controls:</p> <ul style="list-style-type: none"> a) Access to all PII data is for users on PTONet who have verified access to EDMS-C. Additionally, access to PII data is restricted to a small subset of EDMS-C users. b) Manual procedures are followed for handling extracted data containing sensitive PII which is physically transported outside of the USPTO premises. In order to remove data extracts containing sensitive PII from USPTO premises, users must: <ul style="list-style-type: none"> 1. Maintain a centralized office log for extracted datasets that contain sensitive PII. This log must include the date the data was extracted and removed from the facilities, a description of the data extracted, the purpose of the extract, the expected date of disposal or return, and the actual date of return or deletion. 2. Ensure that any extract which is no longer needed is returned to USPTO premises or securely erased and that this activity is recorded on the log. 3. Obtain management concurrence in the log, if an extract aged over 90 days is still required. 4. Store all PII data extracts maintained on a USPTO laptop in the encrypted My Documents directory. This includes any sensitive PII data extracts downloaded via the USPTO Virtual Private network (VPN). 5. Encrypt and password-protect all sensitive PII data extracts maintained on a portable storage device (such as CD, memory key, flash drive, etc.). Exceptions due to technical limitations must have the approval of the Office Director and alternative protective measures must be in place prior to removal from USPTO premises. <p>USPTO is using the following compensating controls to protect PII data:</p>
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- a) No extracts of sensitive data may be copied on to portable media without a waiver approved by the DOC CIO. The request for a waiver must include specifics as to how the data and device are protected, how long the data will be maintained, and how the data on the device will be deleted when no longer required.
- b) All laptop computers allowed to store sensitive data must have full disk encryption.

Section 9: Privacy Act

9.1 Is the PII/BII searchable by a personal identifier (e.g, name or Social Security number)?

- Yes, the PII/BII is searchable by a personal identifier.
- No, the PII/BII is not searchable by a personal identifier.

9.2 Indicate whether a system of records is being created under the Privacy Act, 5 U.S.C. § 552a. *(A new system of records notice (SORN) is required if the system is not covered by an existing SORN).*

As per the Privacy Act of 1974, “the term ‘system of records’ means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.”

<input checked="" type="checkbox"/>	Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name, number, and link. <i>(list all that apply):</i> DOC/DEPT 10 : Executive Correspondence Files DOC/DEPT 11 : Candidates for Membership, Members, and Former Members of Department Commerce Advisory Committees
<input type="checkbox"/>	Yes, a SORN has been submitted to the Department for approval on <u>(date)</u> .
<input type="checkbox"/>	No, this system is not a system of records and a SORN is not applicable.

Section 10: Retention of Information

10.1 Indicate whether these records are covered by an approved records control schedule and monitored for compliance. *(Check all that apply.)*

<input checked="" type="checkbox"/>	There is an approved record controls schedule. Provide the name of the record controls schedule: GRS 5.1:020: Non-recordkeeping copies of electronic records. Temporary. Destroy immediately after copying to a recordkeeping system or otherwise preserving, but longer retention is authorized if required for business use.
<input type="checkbox"/>	No, there is not an approved record controls schedule. Provide the stage in which the project is in developing and submitting a records control schedule:

<input checked="" type="checkbox"/>	Yes, retention is monitored for compliance to the schedule.
<input type="checkbox"/>	No, retention is not monitored for compliance to the schedule. Provide explanation:

10.2 Indicate the disposal method of the PII/BII. *(Check all that apply.)*

Disposal			
Shredding	<input type="checkbox"/>	Overwriting	<input type="checkbox"/>
Degaussing	<input type="checkbox"/>	Deleting	<input checked="" type="checkbox"/>
Other (specify):			

Section 11: NIST Special Publication 800-122 PII Confidentiality Impact Level

11.1 Indicate the potential impact that could result to the subject individuals and/or the organization if PII were inappropriately accessed, used, or disclosed. *(The PII Confidentiality Impact Level is not the same, and does not have to be the same, as the Federal Information Processing Standards (FIPS) 199 security impact category.)*

<input checked="" type="checkbox"/>	Low – the loss of confidentiality, integrity, or availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.
<input type="checkbox"/>	Moderate – the loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
<input type="checkbox"/>	High – the loss of confidentiality, integrity, or availability could be expected to have a severe or catastrophic adverse effect on organizational operations, organizational assets, or individuals.

11.2 Indicate which factors were used to determine the above PII confidentiality impact level. *(Check all that apply.)*

<input checked="" type="checkbox"/>	Identifiability	Provide explanation: Name, Occupation, Email, Home Address and Telephone Number can be easily used to identify an individual.
<input checked="" type="checkbox"/>	Quantity of PII	Provide explanation: The system only holds generic identification fields including name, email address, phone number and home/business address. PII records are less than 200 per year.
<input checked="" type="checkbox"/>	Data Field Sensitivity	Provide explanation: System does not solicit any sensitive data fields that contain identifying numbers and/or dates
<input checked="" type="checkbox"/>	Context of Use	Provide explanation: The data that is stored within EDMS-C is used to identify potential nominees for Public Advisory Committees.
<input checked="" type="checkbox"/>	Obligation to Protect Confidentiality	Provide explanation: This system is governed by The Privacy Act of 1974, which prohibits the disclosure of information from a system of records absent of the written consent of the subject individual.
<input checked="" type="checkbox"/>	Access to and Location of PII	Provide explanation: Data usage is restricted to a minimal number

		of EDMS-C users within the Office of the Undersecretary.
<input type="checkbox"/>	Other:	Provide explanation:

Section 12: Analysis

12.1 Identify and evaluate any potential threats to privacy that exist in light of the information collected or the sources from which the information is collected. Also, describe the choices that the bureau/operating unit made with regard to the type or quantity of information collected and the sources providing the information in order to prevent or mitigate threats to privacy. (For example: If a decision was made to collect less data, include a discussion of this decision; if it is necessary to obtain information from sources other than the individual, explain why.)

USPTO has identified and evaluated potential threats to PII such as insider threats and adversarial entities which may cause a loss of confidentiality, accessibility and integrity of information. Based upon USPTO's threat assessment the Agency has implemented baseline security controls to mitigate these risk to information to an acceptable level. USPTO has policies, procedures and training to ensure that employees are aware of their responsibility of protecting PII and the negative impact on the agency if there is loss, misuse, or unauthorized access to or modification of sensitive private information. USPTO requires annual security role-based training and annual mandatory security awareness procedure training for all employees.

12.2 Indicate whether the conduct of this PIA results in any required business process changes.

<input type="checkbox"/>	Yes, the conduct of this PIA results in required business process changes. Explanation:
<input checked="" type="checkbox"/>	No, the conduct of this PIA does not result in any required business process changes.

12.3 Indicate whether the conduct of this PIA results in any required technology changes.

<input type="checkbox"/>	Yes, the conduct of this PIA results in required technology changes. Explanation:
<input checked="" type="checkbox"/>	No, the conduct of this PIA does not result in any required technology changes.